

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CATHOLIC LEGAL IMMIGRATION NETWORK, INC., et al.,)
)
)
Plaintiffs,)
)
)
v.) Civil Action No. 8:20-cv-02042-TDC
)
UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, et al.,)
)
)
Defendants.)
)

JOINT STATUS REPORT

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS ("Request 1"), State ("Request 2"), and DHS ("Request 3") respectively. (Compl. ¶¶ 27-40.)

2. On August 6, 2021, USCIS produced its tenth rolling release of documents comprised of 5 pages and 320 partially produced pages from the Office of Policy and Strategy component (OP&S) to Plaintiffs in response to Request 1. USCIS is presently processing the eleventh production of USCIS pages. Subject to FOIA exemptions, the eleventh production of

USCIS pages is expected to be produced on or about September 6, 2021. Per the request of Plaintiffs, the eleventh production will consist of responsive, non-FOIA exempt documents from OP&S.

3. State produced its eighth rolling release on July 16, 2021 comprised of 14 records released in part. State is continuing to process unclassified potentially responsive documents. The ninth production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before August 17, 2021. While the processing of records on classified systems continues to be slowed by the ongoing impact of COVID-19 mitigation measures on staffing, State has completed its searches of classified systems.

4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: August 16, 2021

Respectfully submitted,

/s/
Khaled Alrabe
Amber Qureshi
National Immigration Project of the
National Lawyers Guild
2201 Wisconsin Ave., NW Suite 200
Washington, DC 20007
Tel: (510) 679-3994
alrabe@nipnlg.org
amber@nipnlg.org

/s/
Victoria Neilson
Michelle N. Mendez
Catholic Legal Immigration Network (CLINIC)
8757 Georgia Ave., Suite 850
Silver Spring, MD 20910
Tel: (540) 907-1761
Fax: (301) 565-4824
vneilson@cliniclegal.org
mmendez@cliniclegal.org

Jonathan F. Lenzner
Acting United States Attorney

/s/
Kimberly S. Phillips
Assistant United States Attorney
36 S. Charles St., 4th Flr.
Baltimore, MD 21201
Tel: (410) 209-4800
Kimberly.Phillips@usdoj.gov